

# Exhibit 23

Deposition of Shannon Knapp (April 11, 2017) (excerpted)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon )  
Fitch, on behalf of )  
themselves and all others )  
similarly situated, )  
                              )  
                               )  
Plaintiffs, )  
                              )  
v.                         ) Lead Case No.  
                              ) 2:15-cv-01045-RFB-(PAL)  
Zuffa, LLC, d/b/a Ultimate )  
Fighting Championship and )  
UFC,                        )  
                              )  
Defendant. )  
\_\_\_\_\_ )

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF SHANNON KNAPP

KANSAS CITY, MISSOURI

April 11, 2017

9:13 a.m.

Reported By:  
Kay Merley, RMR, CRR  
Job No. 49614

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	58		60
1	so for me, you know, I -- it doesn't, you 2 know, up my profile of Invicta or anything 3 like that, but it does make a difference for 4 the women in the sport. I mean, it's not 5 putting more money in my bank account for 6 Invicta. It's not making us more lucrative, 7 so -- but does it -- I would be sending those 8 athletes anyway. It's just kind of like an 9 extended courtesy.	1	<b>Q. So I'd just like to talk about on the second page, the third full paragraph starts with the words "in keeping." And it says, "In keeping with the goal of providing the best opportunities possible, Knapp will work in partnership with other promotions to ensure that fighters are able to stay busy. Knapp states that Invicta FC fighters will all be paid a fair market value, but given that her promotion will likely stick to four events per year, she understands that that may not be enough to get every fighter the fight that she wants -- the fights, excuse me, that she wants or needs."</b>
10	<b>Q. Okay.</b>	10	So there's -- first of all, this paragraph is paraphrasing you, but is there any reason to believe you didn't -- that it misrepresents your position or misrepresents -- misrepresented your position at that time.
11	MR. RAYHILL: So I guess we're going 12 to go -- in terms of exhibit numbers, we'll 13 just start with Knapp 1.	11	MR. WIDNELL: Objection, foundation.
14	(Deposition Exhibit 1 was marked for 15 identification.)	12	A. So I think that when you read that paragraph, 13 I think that you definitely have to look at 14 the fact that I state, you know, I'm only 15 going to do about four events a year, so if I
16	A. Should have brought my glasses, huh?	16	sign talent, four events, I can't keep those 17 athletes busy, so, you know, that was my basis 18 for saying that, you know, I'm going to work 19 with other promotions, but I work with other 20 promotions anyway, so...
17	<b>Q. (By Mr. Rayhill) Not all of them -- the print 18 is particularly small in this one.</b>	21	<b>Q. And so four events a year is not enough for a 22 fighter to --</b>
18	A. It's away -- it's like...	22	A. No, I mean, not if you have a lot of athletes. 23 And you have to remember, when I started 24 Invicta, I had a bunch of athletes that wanted 25 to fight. I mean, there's no way I could keep athletes busy with four fights a year.
19	MR. DURBIN: You want me to hold it?	23	<b>Q. So in order to keep the -- get the athletes 24 enough fights, you would work with other 25 promotions?</b>
20	A. Not that bad, not that clear over there. So 21 this is an interview or something, right?	24	A. Yeah.
21	MR. WIDNELL: Have you produced this 22 to us?	25	<b>Q. And Jewel was one of those promotions?</b>
22	MR. RAYHILL: No.	25	A. In 2012, I think. I think that's when -- I'm not sure in the beginning if we signed, like, long-term contracts. You know, I'm not sure if we signed -- we might have done -- maybe the first couple shows we did one-offs, you know, which would just be one fight, so I would have to look back, but...
23			<b>Q. Okay. That's all. I'm finished with that</b>
24			
25			

16 (Pages 58 to 61)

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1 <b>document.</b> 2            MR. WIDNELL: Kevin, could we go off 3            the record just briefly? 4            MR. RAYHILL: Absolutely. 5            THE VIDEOGRAPHER: Stand by, please. 6            Going off record at 10:23 a.m. 7            (A recess was taken.) 8            THE VIDEOGRAPHER: Here marks the 9            beginning of Media 2. Resuming record at 10          10:37 a.m. 11 <b>Q. (By Mr. Rayhill) Okay. Does Invicta have a</b> 12 <b>relationship with -- strike that. Does</b> 13 <b>Invicta have a financial relationship with</b> 14 <b>Zuffa?</b> 15          A. What do you mean? 16 <b>Q. Well, let me make it a more general question.</b> 17 <b>Does Invicta have a business relationship with</b> 18 <b>Zuffa of any kind?</b> 19          A. Yes. 20 <b>Q. Can you tell me about that?</b> 21          A. Yes. We have a broadcast distribution deal 22          with the UFC, which means that we air on UFC 23          Fight Pass. 24 <b>Q. And how long have you had that arrangement</b> 25 <b>with Zuffa?</b>	62	1       A. Oh, absolutely, once, yeah, one time. 2 <b>Q. Can you tell me when that was?</b> 3       A. It would be February of 2015, I believe. 4 <b>Q. And can you tell me about -- so can you tell</b> 5 <b>me how much financial support they provided?</b> 6       A. They just covered an event, so I'd have to 7       look at the figures, you know, to be exact, 8       but I know they just covered an event, a full 9       event once. 10 <b>Q. So when you say they covered the full event,</b> 11 <b>do you mean they paid for all expenses related</b> 12 <b>to that event?</b> 13       A. Yes. 14 <b>Q. Do you recall where the event was?</b> 15       A. Yes. At the Shrine in L.A. 16 <b>Q. The Shrine is the Shrine Auditorium?</b> 17       A. Uh-huh. 18 <b>Q. Do you recall if Zuffa provided any logistical</b> 19 <b>support for that event?</b> 20       A. In terms of? 21 <b>Q. Did they help you find the venue?</b> 22       A. Yes. 23 <b>Q. Did they help you sell tickets?</b> 24       A. What do you mean by that? 25 <b>Q. Did they -- well, let's strike that question.</b>	64
1       A. I think I'm going on two years. 2 <b>Q. And can you tell me what sort of content, what</b> 3 <b>sort of Invicta content gets -- let's back up.</b> 4 <b>Does some Invicta content get broadcast on</b> 5 <b>Fight Pass?</b> 6       A. Yes. 7 <b>Q. And Fight Pass is a subscription service that</b> 8 <b>UFC runs; is that correct?</b> 9       A. Yes. 10 <b>Q. Can you tell me what kind of content gets</b> 11 <b>broadcast, what kind of -- type of Invicta</b> 12 <b>content gets broadcast on Fight Pass?</b> 13       A. Yeah, live events. 14 <b>Q. And how many live events per year, let's say?</b> 15       A. Six to eight, you know. I mean, this year 16       will be six. 17 <b>Q. How many live events does Invicta typically do</b> 18 <b>in a year?</b> 19       A. About six. We're looking to do eight this 20       year. 21 <b>Q. Has Zuffa ever provided any financial support</b> 22 <b>for an Invicta event, a live MMA event?</b> 23       A. Yeah. 24 <b>Q. And can you tell me roughly how many times</b> 25 <b>Zuffa has provided financial support?</b>	63	1 <b>Did they help you determine the price for the</b> 2 <b>tickets?</b> 3       A. Yes, because I asked for assistance. 4 <b>Q. Did they help with advertising for the event?</b> 5       A. I believe not, other than on the digital 6       platform. 7 <b>Q. Was that event broadcast -- when you say the</b> 8 <b>digital platform, are you talking about Fight</b> 9 <b>Pass?</b> 10       A. Yes. 11 <b>Q. Okay. Was that event broadcast on Fight Pass?</b> 12       A. Yes. 13 <b>Q. So when you say they advertised on the digital</b> 14 <b>platform, do you mean that they did</b> 15 <b>promotional ads?</b> 16       A. Right, correct. 17 <b>Q. For the upcoming event?</b> 18       A. Correct. 19 <b>Q. And that was the only event that they provided</b> 20 <b>that sort of --</b> 21       A. Yeah. 22 <b>Q. -- financial support for?</b> 23       A. Yes. 24 <b>Q. And the same for the logistical support,</b> 25 <b>helping find a venue?</b>	65

17 (Pages 62 to 65)

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1 A. They did help me one other time with a venue. 2 <b>Q. Do you remember when that was?</b> 3 A. That would have been, I think, July of 2015. 4 <b>Q. Okay. And where was that event?</b> 5 A. The Cosmopolitan, the Cosmopolitan in 6 Las Vegas. 7 <b>Q. In Las Vegas, okay. And they -- so when you</b> 8 <b>say they helped you with the venue, did they</b> 9 <b>speak to the venue on Invicta's behalf?</b> 10 A. They introduced me, so -- but, you know, that 11 would be helping me, assisting me, so... 12 <b>Q. Sure. But they did not provide financial</b> 13 <b>support?</b> 14 A. No, no. Yeah, I took care of everything. 15 <b>Q. Okay. Does Invicta hold its fights in an</b> 16 <b>octagon?</b> 17 A. No. 18 <b>Q. Can you tell me about the setting that the</b> 19 <b>fights are?</b> 20 A. Hexagon. 21 <b>Q. It's a hexagon?</b> 22 A. Uh-huh. 23 <b>Q. I see, okay. Has Invicta ever held an event</b> 24 <b>in an octagon?</b> 25 A. Yes. I rented their cage once when I did a	66	[REDACTED] 3 <b>Q. But the only time you did a promotion --</b> 4 A. Yeah, to date, yeah. 5 <b>Q. Has Zuffa ever acquired the contracts of any</b> 6 <b>Invicta fighters?</b> 7 A. Acquired? You mean -- 8 <b>Q. Purchased.</b> 9 A. Yes. 10 <b>Q. Can you tell me how often that's happened?</b> 11 A. Once. 12 <b>Q. Okay. Can you tell me when that was?</b> 13 A. December of 2013. 14 <b>Q. Why did Invicta -- first of all, can you tell</b> 15 <b>me how many contracts Zuffa purchased at that</b> 16 <b>time?</b> 17 A. Not -- not correctly. I mean, I can't 18 remember exactly. I mean, they purchased a 19 division from me. 20 <b>Q. Okay. What division was that?</b> 21 A. The strawweight, 115 pounds. 22 <b>Q. Has Zuffa ever acquired the contract of any</b> 23 <b>other -- other than that one event you just</b> 24 <b>described, has Zuffa ever acquired the</b> 25 <b>contract of another Invicta fighter?</b>	68
1 show in Vegas. 2 <b>Q. Do you recall when that show was?</b> 3 A. 2015 or '16. '15. Wait, let me think, okay? 4 I think it was '16. Yeah. Well -- 5 <b>Q. That's fine.</b> 6 A. -- it was at the Tropicana. It's easy to find 7 online. 8 <b>Q. It was at the Tropicana?</b> 9 A. Yeah. [REDACTED]	67	1 A. When you say acquire, what do you mean? Did 2 they purchase? 3 <b>Q. Purchased it from Invicta.</b> 4 A. No. 5 <b>Q. Have you ever offered to provide fighters to</b> 6 <b>Zuffa?</b> 7 A. Yes. 8 <b>Q. Do you recall about how often?</b> 9 A. Well, when I think -- if -- if I offered? 10 What do you mean by offered exactly? 11 <b>Q. Did you communicate to Zuffa that you could or</b> 12 <b>would provide them with a fighter?</b> 13 A. Yeah, if there's a particular athlete that's 14 ready -- wants to move on or something like 15 that, then, yeah, I'll speak to them about it. 16 They never approach my athletes without -- I 17 mean, nine times out of ten, it's my athlete 18 or management approaches them, and then they 19 will call me and let me know that one of my 20 athletes is approaching, but there have been 21 times that I think an athlete -- they're a 22 better home for an athlete, and I have made 23 that call and spoke with a matchmaker. 24 <b>Q. And so when you say you've made that call,</b> 25 <b>you've allowed the athlete to move to the UFC?</b>	69

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<p style="text-align: right;">126</p> <p>1 designated -- if it's designated "attorneys' 2 eyes only," then only the attorneys can see 3 it.</p> <p>4 THE WITNESS: I mean, that's my issue 5 with discussing my business stuff is because 6 some of the plaintiffs Tweet stuff, say stuff. 7 I see it. And I don't want my business, my 8 company business, because this has nothing to 9 do with me, so I don't want my company 10 business out there. That's the only reason.</p> <p>11 MR. WIDNELL: Just for the record, 12 neither Mr. Rayhill nor I can offer you legal 13 advice about how this process works, so you 14 should really talk to your own attorney about 15 how this could be used. There are some 16 wrinkles in terms of how it could be used in 17 terms of what's ultimately treated as 18 confidential.</p> <p>19 THE WITNESS: Okay, thank you.</p> <p>20 MR. RAYHILL: Agree. Thank you, Nick.</p> <p>21 THE WITNESS: Thank you.</p> <p>22 MR. DURBIN: But we certainly have 23 the 21-day right to review it and mark 24 anything that we think should be designated</p>	<p style="text-align: right;">128</p> <p>[REDACTED]</p> <p>4 the sources of that revenue?</p> <p>5 A. What do you mean exactly?</p> <p>6 Q. Well, let's go through a couple possibilities.</p> <p>7 A. Okay.</p> <p>8 Q. Are these -- is Invicta's content ever shown 9 on a Pay-Per-View basis?</p> <p>10 A. Not Pay-Per-View, on other broadcast 11 platforms.</p> <p>12 Q. Okay. So your live events are never broadcast 13 on a Pay-Per-View basis?</p> <p>14 A. Not that I'm aware of.</p> <p>15 Q. Okay. And they are broadcast on Fight Pass?</p> <p>16 A. You know what, maybe I take that back, because 17 it has been aired on Sony, like the Play 18 Station thing, so I don't know if you have 19 to -- I'd have to -- yeah.</p> <p>20 Q. Vague understanding.</p> <p>[REDACTED]</p>
<p style="text-align: right;">127</p> <p>1 either confidential or attorneys' eyes only.</p> <p>2 MR. RAYHILL: You do have that.</p> <p>3 THE WITNESS: And you're very aware 4 of what my concerns are?</p> <p>5 MR. DURBIN: Right, and if we 6 exercise that right, it will restrict access 7 accordingly.</p> <p>8 THE WITNESS: Perfect, thank you.</p> <p>[REDACTED]</p>	<p style="text-align: right;">129</p> <p>[REDACTED]</p> <p>6 Q. Okay. Now I really am done with that.</p> <p>7 A. Okay.</p> <p>8 MR. RAYHILL: How's everybody holding 9 up? If everybody's doing okay? I'm fine to 10 continue.</p> <p>11 MR. DURBIN: Do you want to take a 12 break?</p> <p>13 THE WITNESS: It's up to you guys.</p> <p>14 MR. DURBIN: Let's plow ahead for a 15 few more minutes.</p> <p>16 MR. RAYHILL: Okay. Very good.</p> <p>17 Q. (By Mr. Rayhill) Okay. So when you put on an 18 Invicta event --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- can you tell me what the main expenses you 21 face in putting on an event are?</p> <p>22 A. The main or the biggest?</p> <p>23 Q. Yeah.</p> <p>24 A. Fight cards, production, those are always the 25 biggest. Well, travel, hotels. I mean, it's</p>

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<p style="text-align: center;">214</p> <p>1      <b>relationship with Cyborg, the UFC benefited by</b>      2      <b>making sure that she had fights and even</b>      3      <b>though they couldn't provide --</b></p> <p>4      A. Oh, yeah, for sure.</p> <p>5            MR. RAYHILL: Objection, calls for      6            speculation. Sorry.</p> <p>7      A. For sure, yeah, for sure.</p> <p>8      Q. (By Mr. Widnell) <b>We talked a little bit about</b>      9      <b>the sale of the 115-pound division, and I</b>      10     <b>think Mr. Rayhill asked you whether or not you</b>      11     <b>have a 115-pound division now.</b></p> <p>12     A. Yes, I do.</p> <p>13     Q. <b>It sounds like when you sold the contracts,</b>      14     <b>you sold the contracts for a significant</b>      15     <b>portion of the 115-pound division to UFC. How</b>      16     <b>quickly were you able to bring in equivalent</b>      17     <b>fighters?</b></p> <p>18     A. Like probably the next week. I think within      19     ten days I refilled the division.</p> <p>20     Q. <b>So would you say that there's no shortage of</b>      21     <b>fighters right now that you could -- at that</b>      22     <b>time that you could have gotten?</b></p> <p>23     A. Yeah, I mean, yeah.</p> <p>24     Q. <b>When you're looking for fighters, what</b>      25     <b>criteria do you use to pick out fighters to</b></p>	<p style="text-align: center;">216</p> <p>1      <b>fights?</b></p> <p>2      A. Absolutely. That's what, you know, I'm good      3      at, is picking young talent, and because      4      Invicta is all female, you know, and      5      we're not -- you know, there's not a lot of      6      men on the card, it's all women, I can build      7      stars very quickly, so...</p> <p>8      Q. <b>So I think you just described a difference</b>      9      <b>between women's MMA fighting and men's MMA</b>      10     <b>fighting. Is that accurate? Would you say</b>      11     <b>that it's harder to build an MMA male fighter</b>      12     <b>as quickly as an MMA female fighter?</b></p> <p>13            MR. RAYHILL: Objection, calls for      14            speculation.</p> <p>15     A. In this day and age, it's -- you know, it's --      16     you know, it's easy to build men as well. You      17     know, I think they're about the same. The      18     difference is trying to build a female athlete      19     in an organization that has men and only a      20     couple divisions for women, you know, you're      21     going to have a ton of male fights on that      22     card and only a couple female fights, where      23     Invicta we're all women, so the women are      24     going to circle through more frequently and      25     get more exposure, therefore, making it easier</p>
<p style="text-align: center;">215</p> <p>1      <b>contract with?</b></p> <p>2      A. Sign? First and foremost talent. You know,      3      that's always the biggest deals. I'm looking      4      for the most talented. You know, then you      5      apply everything else, you know, goes into it,      6      but talent is the major thing you're looking      7      for.</p> <p>8      Q. <b>I think Mr. Rayhill asked about rankings. Do</b>      9      <b>you consider a fighter's rankings as part of</b>      10     <b>your criteria for making a decision on whether</b>      11     <b>or not to sign a fighter?</b></p> <p>12     A. Sometimes. It depends. You know, it's going      13     to depend, definitely depend. There are a lot      14     of athletes that are not ranked yet, but only      15     because they're young athletes, so I'm still      16     going to sign them based on the talent factor.</p> <p>17     Q. <b>So with a young athlete that you're going --</b>      18     <b>like that that you just described, could that</b>      19     <b>be an athlete that hasn't had a lot of fights</b>      20     <b>yet?</b></p> <p>21     A. Absolutely, yeah.</p> <p>22     Q. <b>So do you feel you have the ability to pick</b>      23     <b>out fighters who are promising fighters even</b>      24     <b>if they haven't had a, you know, significant</b>      25     <b>number of fights in MMA -- professional MMA</b></p>	<p style="text-align: center;">217</p> <p>1      to build them faster.</p> <p>2      Q. <b>Are there differences between women's MMA</b>      3      <b>promotions and men's MMA promotions?</b></p> <p>4            MR. RAYHILL: Objection. Calls --</p> <p>5      A. Are there differences? Not to -- a little. I      6      mean, I provide a hair braider. I don't know      7      that they do that for the men, you know, so      8      there are certain differences and things like      9      that, but...</p> <p>10     Q. (By Mr. Widnell) <b>Would you say that MMA</b>      11     <b>promotions for men are -- are widely known and</b>      12     <b>are very successful?</b></p> <p>13            MR. RAYHILL: Objection, calls for      14            speculation.</p> <p>15     A. Yeah, I mean...</p> <p>16     Q. (By Mr. Widnell) <b>Would you say MMA promotions</b>      17     <b>for women are widely known and as successful</b>      18     <b>as men's divisions right now?</b></p> <p>19     A. Well, I think they're getting there. I think      20     that they're not that many. There's me, you      21     know, that are all women.</p> <p>22     Q. <b>How long have there been women MMA promotions?</b></p> <p>23     A. Oh, well, there haven't been where they're all      24     female. Women have competed on the cards, you      25     know, for ten, however many years, but when it</p>

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<p style="text-align: right;">218</p> <p>1 comes to all female, you know, I think there 2 was a promotion years -- you know, maybe five, 3 six years ago that threw a few fights here and 4 there, but nothing that's been steady, like 5 what we do at Invicta.</p> <p><b>Q. And how long have men's MMA promotions been in existence?</b></p> <p>8 A. Oh, a long time, long time. I mean, early 9 '90s, maybe sooner. I wasn't involved back 10 then, so...</p> <p><b>Q. Would you say that women's MMA promoters or the business of promoting MMA fights for women is more of a nascent industry right now?</b></p> <p>14 A. Possibly, yeah.</p> <p><b>Q. At one point I think you were talking about the success of a recent Invicta event, and I think you talked about how it had gone up against March Madness.</b></p> <p>19 A. Yeah, pretty cool.</p> <p><b>Q. When you're competing for eyeballs for an audience, do you compete with Sports Center too?</b></p> <p>23 A. I think you're competing with everybody when 24 you're trying to get the eyeballs, you know, I 25 mean, everything, even reality series. You</p>	<p style="text-align: right;">220</p> <p>1 male and female, you know, my mother's -- 2 women love it that are my mom's age, so, yeah, 3 I think it's all over the board.</p> <p><b>Q. When you're competing for fighters to bring in fighters, which promoters do you compete with to -- when you're trying to sign a fighter?</b></p> <p>7 A. Everybody a little bit to a degree, you know. 8 Some are more aggressive. You know, I have 9 more competition with certain ones. You know, 10 can maneuver and do things that are not so 11 nice, but, yeah, you compete a little bit 12 about everybody. Even a little bit with the 13 UFC, even though we're on Fight Pass, there's 14 still going to be an athlete that they see, I 15 see, and we're both going to try to sign the 16 athlete.</p> <p><b>Q. So if you know that UFC is trying to sign an athlete, that doesn't stop you from trying to sign the athlete?</b></p> <p>20 A. Heck, no. I don't put UFC out in my 21 contracts. I'm not a feeder. I -- you know, 22 I really want to make this clear. I run my 23 promotion differently than all the other 24 promotions out there. You know, I can't ask 25 my athletes to fight hard for me if I'm not</p>
<p style="text-align: right;">219</p> <p>1 know, you're trying to get -- but to me, 2 you're kind of competing with everybody that's 3 got something going on that night.</p> <p><b>Q. Is there a specific demographic that you're targeting?</b></p> <p>6 A. Not really. I mean, you've got your typical 7 18 to 35, but you kind of target everybody. 8 We're all over the board.</p> <p><b>Q. When you were working at Strikeforce, was there a demographic that you were targeting?</b></p> <p>11 A. 18-to-35-year-old male.</p> <p><b>Q. Would that be a difference between your promotion and other promotions that tended to have a focus on men's --</b></p> <p>15 A. Yeah.</p> <p><b>Q. -- men's MMA promotions?</b></p> <p>17 A. Yeah.</p> <p>18 MR. RAYHILL: Objection, calls for speculation.</p> <p>20 A. You know, I think that it's pretty standard 21 across the board on the male side of the 22 sport. I think for us, at Invicta, you know, 23 I can look at our audience, and I can see 24 that, you know, 18 to 35, the young kids, the 25 mature -- what I consider mature audience with</p>	<p style="text-align: right;">221</p> <p>1 willing to fight hard for them and give them 2 the opportunities they're looking for. And I 3 assure you, every one of them wants to be in 4 the UFC. You know, it's not like anybody's 5 poaching or anybody's trying to take. This is 6 the dream, you know.</p> <p><b>Q. When you say that everybody wants to be in the UFC, is that because UFC has restricted the ability of other promoters to compete, or is it because of something unique to the UFC?</b></p> <p>11 A. I think it's the Broadway, it's the Q-Tip, 12 it's the Kleenex, it's the big stage that we 13 all look at, you know. This day and age, I 14 mean, there's a lot of options out there these 15 days, a lot of options, a lot more than there 16 were years and years ago, but there are 17 definitely options, and, you know, I don't 18 know why each one wants to, but it's something 19 that's important to them, you know.</p> <p><b>Q. So my question was is in any way UFC's ability to be attractive to professional MMA fighters a function of UFC doing things to hurt other --</b></p> <p>24 A. No.</p> <p><b>Q. -- fighters?</b></p>

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<p style="text-align: right;">222</p> <p>1           MR. RAYHILL: Objection, calls for 2       speculation. 3   A. I mean, no, I don't see that. I mean, I don't 4       see that.</p> <p>5   <b>Q. (By Mr. Widnell) Has UFC ever done anything to 6       harm Invicta's ability to compete?</b></p> <p>7   A. No. Actually, they've been really good, you 8       know, in the business relationship, been 9       really good. Never stopped me, you know -- 10      yeah, I have nothing to complain. If I did, I 11      would tell you.</p> <p>12   <b>Q. Did UFC ever do anything to harm Strikeforce 13       while you were working at Strikeforce to your 14       knowledge?</b></p> <p>15   A. Not that I saw. I mean, you always get that 16       rumor stuff, but never anything that, you 17       know, like a direct shot.</p> <p style="text-align: center;"></p> <p>25   <b>Q. And did UFC to your knowledge do anything to</b></p>	<p style="text-align: right;">224</p> <p>1       <b>go to Bellator on occasion. Would that be -- 2       would they go and fight for Bellator while 3       they were still under a contract with you?</b></p> <p>4   A. Uh-huh, I have a couple that are going to 5       fight over there every once in a while.</p> <p>6   <b>Q. So are those -- are those fighters who are 7       fighting for Bellator currently under contract 8       with you?</b></p> <p>9   A. Yeah, and what they are is, once again, it's 10      that regional thing where Bellator will go 11      into market, maybe one of my athletes are 12      there, so they'll compete on the card and sell 13      tickets or something.</p> <p>14   <b>Q. Do you regard that as co-promotion?</b></p> <p>15   A. No, no.</p> <p>16   <b>Q. Would you describe yourself as someone who's 17       knowledgeable of the MMA industry?</b></p> <p>18   A. Yeah.</p> <p>19   <b>Q. Is the term "elite professional MMA fighter" 20       widely understood within the MMA industry?</b></p> <p>21   MR. RAYHILL: Objection. Calls for 22       speculation.</p> <p>23   A. Repeat that just so I make sure I have a real 24       grasp of what you're saying.</p> <p>25   <b>Q. (By Mr. Widnell) Sure. Is the term "elite</b></p>
<p style="text-align: right;">223</p> <p>1       <b>harm IFC while you worked at IFC?</b></p> <p>2   A. No, not that --</p> <p>3       MR. RAYHILL: Objection, IFL.</p> <p>4       THE WITNESS: It's IFL.</p> <p>5       MR. WIDNELL: I'm sorry, IFL.</p> <p>6       THE WITNESS: That's okay.</p> <p>7   <b>Q. (By Mr. Widnell) I think you also -- you spoke 8       about using Jewel fighters. When you have a 9       fighter from Jewel that you use in an event, 10      does that fighter, then, typically go back to 11      fight for Jewel, or do you try to hire that 12      fighter?</b></p> <p>13   A. No, I have a contract with them as well, but I 14       also -- they fight, you know, if the 15       opportunity comes there.</p> <p>16   <b>Q. When a fighter for Jewel fights for you at an 17       event, do you regard that as co-promoting?</b></p> <p>18   A. Actually, no. I mean, once again, my 19       definition of co-promoting is more of the 20       billing. You know, that's what I think of is 21       you co-promote it like that, and I don't give 22       any kind of billing. Technically we are. You 23       know, if they have a contract there too, we're 24       co-promoting, but not...</p> <p>25   <b>Q. And you also spoke about your fighters would</b></p>	<p style="text-align: right;">225</p> <p>1       <b>professional MMA fighter" widely understood 2       within the MMA industry?</b></p> <p>3   A. I would think so.</p> <p>4   <b>Q. Do you know what that term means?</b></p> <p>5   A. I know what I perceive it to mean. I mean, to 6       me an elite professional is one of our 7       top-tier MMA athletes.</p> <p>8   <b>Q. Do you think that other people would share 9       your perspective of what that term means?</b></p> <p>10   MR. RAYHILL: Speculation, objection.</p> <p>11   A. I mean, the educated, you know, part of the 12       sport, you know, would definitely say that. I 13       mean, a typical fan, I don't know if they'd 14       know the difference if you're an MMA fighter 15       or if you're an elite.</p> <p>16   <b>Q. (By Mr. Widnell) So using that term, would you 17       say that all UFC fighters are elite 18       professional MMA fighters?</b></p> <p>19   MR. RAYHILL: Objection, calls for 20       speculation.</p> <p>21   A. I would think that most people that compete 22       there, you know, are at a higher level. But 23       in my opinion, you know, it's going to be the 24       A level that I consider to be the elite MMA.</p> <p>25   <b>Q. (By Mr. Widnell) So if I heard you correctly,</b></p>